

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BOB A. BRINSON,

Petitioner,

v.

WALTER NICHOLSON,

Respondent.

Case No. 18-cv-05007

Hon. Robert W. Gettleman

Hon. Sheila Finnegan

PETITIONER'S UNOPPOSED MOTION TO EXTEND TIME TO FILE REPLY

Petitioner Bob A. Brinson ("Petitioner") hereby moves to extend the deadline for filing a reply brief in support of his Amended Petition for Writ of Habeas Corpus by one week to April 15, 2019. Respondent does not oppose Petitioner's request. In support of this motion, Petitioner states as follows:

1. Petitioner is a prisoner of the Illinois Department of Corrections currently residing at Stateville Correctional Center in Crest Hill, Illinois.

2. On July 23, 2018, this Court received and docketed Petitioner's *pro se* Petition for Writ of Habeas Corpus and supporting materials. (ECF No. 1.)

3. On August 14, 2018, the Court stayed this proceeding for 90 days so Petitioner could file an amended petition and supporting memorandum of law with the help of newly-retained *pro bono* counsel. (ECF No. 13.) The Court granted Plaintiff's subsequent motion for an additional extension.

4. Petitioner filed his Amended Petition for Writ of Habeas Corpus on December 14, 2018. (ECF No. 18.)

5. On December 17, 2018, the Court entered an order requiring Respondent to

answer or otherwise respond to the amended petition by January 27, 2019, and ordering Plaintiff to reply by February 24, 2019. (ECF No. 22.)

6. Respondent moved for an extension of his deadline to respond. On January 29, 2019, the Court granted that motion and ordered Respondent to respond to the petition by February 26, 2019. (ECF No. 26.) The Court's order granting Respondent's motion to extend his deadline to respond did not include a new date for Petitioner's reply.

7. On March 19, 2019, the Court granted Petitioner's motion to schedule a reply deadline. (ECF No. 31.) Petitioner's reply brief is currently due April 8, 2019. (*See id.*)

8. As explained in Petitioner's motion to schedule a reply deadline, Petitioner's *pro bono* counsel has had trouble communicating with their incarcerated client. Petitioner's counsel therefore was unable to schedule a legal to discuss the reply brief until April 12, 2019. To ensure Petitioner's counsel has adequate time to consult Petitioner before filing the reply, Petitioner requests that the deadline for filing the reply be extended by one week to April 15, 2019.

9. Petitioner has conferred with counsel for Respondent, and Respondent does not oppose Petitioner's request to extend the deadline for his reply brief to April 15, 2019.

WHEREFORE, for the foregoing reasons, Petitioner respectfully requests this Court enter an order (1) extending the deadline for his reply brief to April 15, 2019; and (2) awarding any additional relief the court deems just and proper.

Dated: April 3, 2019

Respectfully submitted,

BOB A. BRINSON

By: s/ Benjamin I. Friedman
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CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that on April 3, 2019, the foregoing document was electronically filed, which will send a Notice of Electronic Filing to all counsel of record.

s/ Benjamin I. Friedman